

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHIKEZIE OTTAH,	:	CASE NO. 1:11-cv-06187-RMB
	:	
PLAINTIFF,	:	[JUDGE RICHARD M. BERMAN]
	:	
VS.	:	
	:	<u>DEFENDANT’S NOTICE OF MOTION</u>
VERIFONE SYSTEMS, INC.,	:	<u>FOR SUMMARY JUDGMENT OF NON-</u>
	:	<u>INFRINGEMENT</u>
DEFENDANT.	:	

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD: Please take notice that VeriFone Systems, Inc. (“VeriFone”) hereby respectfully moves the Court for an Order of Summary Judgment of Noninfringement on all claims asserted by Plaintiff Chikezie Ottah (“Ottah”).

This case involves alleged infringement of U.S. Patent No 7,152,840 (“the ’840 patent”). This motion is based upon the evidence of record showing that the accused VeriFone products do not infringe the sole claim 1 of the ’840 patent directly, indirectly, literally, and/or under the doctrine of equivalents under 35 U.S.C. § 271. This motion is based on this Notice, the supporting Memorandum, and the accompanying Declarations of Avi Itzhakov and Owen Dukelow and exhibit attached thereto.

DATED this 20th day of April, 2012.

Respectfully submitted,

/s/ Cosmin Maier
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